

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE**

In Re:

**Ashleigh Sullivan,
Debtor**

Chapter 7

Case No. 20-10290-BAH

EX PARTE APPLICATION TO EMPLOY ACCOUNTANT TO PREPARE TAX RETURNS

NOW COMES Edmond J. Ford, Chapter 7 Trustee, pursuant to 11 U.S.C. §327, Bankruptcy Rule 2014(a) and applicable local bankruptcy rules to request that this Court approve the employment of Duane A. D'Agnese, CPA, CIRA, and Duane A. D'Agnese & Company, P.A. of 132 Portsmouth Street, Concord, New Hampshire 03301 as accountants and financial consultants to prepare income and other tax returns, to provide other accounting services. In support of this Application, the Trustee respectfully states the following:

1. Edmond J. Ford is the duly appointed Trustee in the above-referenced estate.
2. Trustee anticipates needing to file income tax returns.
3. Duane A. D'Agnese, CPA, CIRA (Certified Public Accountant and Certified Insolvency and Restructuring Advisor) and Duane A. D'Agnese & Company, P.A. have extensive experience in accounting and income tax preparation and consulting services with regard to business operations, insolvency and restructuring.
4. Trustee seeks to engage Duane A. D'Agnese, CPA, CIRA and Duane A. D'Agnese & Company, P.A. to prepare income and other tax returns for a tax period ending in 2021, and potentially in subsequent years, and to provide related accounting services. Duane A. D'Agnese, CPA, CIRA and Duane A. D'Agnese & Company, P.A. do not hold any interests adverse to the estate and are disinterested persons within the meaning of 11 U.S.C. §101(14). Duane A. D'Agnese, CPA, CIRA and Duane A. D'Agnese & Company, P.A. have not entered into any arrangements to share

fees it receives in this case with any other person except as permitted by law.

5. Duane A. D'Agnese, CPA, CIRA and Duane A. D'Agnese & Company, P.A. have agreed to prepare such income tax returns as needed. The fee of Duane A. D'Agnese, CPA, CIRA and Duane A. D'Agnese & Company, P.A. is \$575.00 per year.

6. The employment of Duane A. D'Agnese, CPA, CIRA and Duane A. D'Agnese & Company, P.A. is in the best interest of the estate.

7. In the normal course of business, Duane A. D'Agnese and Company, P.A. revises its hourly rates on January 1 each year. Duane A. D'Agnese and Company, P.A. herein requests that effective January 1 each year, the aforementioned hourly rate(s) for services being rendered in the new year be revised to the current hourly rates which will be in effect at that time. Expenses will be charged at actual costs incurred and will include charges for photocopies, mileage, etc.

WHEREFORE Edmond J. Ford, Ch. 7 Trustee, respectfully requests this Honorable Court:

A. Approve this application, allowing Trustee to employ and compensate Duane A. D'Agnese, CPA, CIRA and Duane A. D'Agnese & Company, P.A. under the terms outlined in this Application; and

B. Grant such other and future relief as this Court deems just and equitable.

Respectfully submitted,
EDMOND J. FORD, TRUSTEE

/s/ Edmond J. Ford
Edmond J. Ford [# 01217]
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Dated: March 29, 2021

Duane A. D'Agnese & Company, P.A.

/s/ Duane A. D'Agnese March 26, 2021

Duane A, D'Agnese, CPA, CIRA
Duane A. D'Agnese & Company, P.A.
132 Portsmouth Street
Concord, NH 03301

CERTIFICATE OF SERVICE

On March 29, 2021, I filed the foregoing Application via the CM/ECF system, which will send a notice of electronic filing to:

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/s/ Edmond J. Ford
Edmond J. Ford